

27

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT  
OF MICHIGAN SOUTHERN DIVISION**

**FRANCIS ROMEO**

**Plaintiff-Pro Se,**

**V**

**JULIE ALBERT, in her  
official and individual capacity;  
Virginia Godell, in her official  
and individual capacity;  
Julie Wojtylko, in his official  
and individual capacity.**

**Defendants.**

Case:2:24-cv-10378

Judge: Grey, Jonathan J.C.

MJ: Patti, Anthony P.

Filed: 02-14-2024 At 03:04 PM

CMP ROMEO V ALBERT, ET AL (LG)

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**There is no file in this Court between the parties  
arising out of the same occurrences  
as alleged in this Complaint**

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**COMPLAINT AND DEMANT FOR TRIAL BY JURY**

**NOW COMES plaintiff Francis Romeo temporarily in Pro Per, and in support  
of his Complaint against the above named Defendants states unto This Honorable  
Court as follows:**

**PRELIMINARY STATEMENT**

**This is an action brought under 42 U.S.C. Section 1983, The First, Fourth, Fifth, and Fourteenth Amendments of The U.S. Constitution to hold The City of Romulus, *via* its policy makers, the Assessor, the Chief of Staff and the Building Department Official accountable for their unreasonable, unlawful, malicious, revengeful violations of Plaintiffs rights in the conspiracy to condemn and demolish Plaintiffs home of twenty-five years(25) (EXHIBIT 1) because he expressed his belief there was corruption in the administration of city contracts. Note: Said corruption was later proven true, the contractor Plaintiff alleged was engaged in overbilling and giving kick backs was charged in Federal Case No.: 18-20255, U.S. D.O.J.-V-William Pritula, who was found guilty and fined nearly \$20,000,000.00, The Honorable Victoria Roberts presiding. The Plaintiff now turns to This Honorable Court in pursuit of justice.**

**JURISDICTION AND VENUE**

- 1. This Complaint seeks remedies pursuant to 42 U.S.C. Section 1983, The First,**

**Fourth, Fifth, and Fourteenth Amendments of The Constitution of The United States.**

**2. The venue is proper before This Honorable Court pursuant to 28 U.S.C. Section 1331 and the amount in question exceeds Seventy-Five Thousand Dollars(\$75,000.00), and The Honorable Court has jurisdiction over all the parties.**

**PARTIES**

**3. Plaintiff Francis Romeo(Plaintiff),at all times relevant resided in The State of Michigan, County of Wayne, City of Romulus.**

**4. Defendant Julie Albert(Albert) at all times relevant resided in The State of Michigan, County of Wayne, City of Plymouth Township, and was employed by The City of Romulus as Assessor.**

**5. Defendant Virginia Godell(Godell) at all times relevant resided in The State of Michigan, County of Wayne, City of Livonia, and was employed by The Romulus Building Department.**

**6. Defendant Julie Wojtyiko(Wojtyiko) at all times relevant resided in the State of**

**Michigan, County of Wayne, City of Romulus and was employed by The City of Romulus as Chief of Staff.**

**FACTS**

**7. Plaintiff hereby incorporates by reference paragraphs one(1) through six(6) of this Complaint as if fully stated herein.**

**8. Plaintiff lives in rural ,formerly farmland, Romulus which was recently rezoned industrial.**

**9. With the new zoning came a trash dumping problem.**

**10. No remedies were forthcoming from law enforcement.**

**11. Defendants knew, or should have known there was a connection between said dumping and the Ordinance/Inspection Dept. and the City Clean up contractor. Said Clean up Contractor was the object of a Federal probe, Case No.: 18-20255, U.S. -v- William Pritula, and was convicted of writing over inflated invoices for work that was never performed and splitting the proceeds with the inspectors.**

**12. Before the Contractors Conviction Plaintiff received an assessment on his tax bill for Two-Thousand Three Hundred and Ten (\$2,310.00) Dollars for “Weed Cutting” that was never done. (EXHIBIT 2)**

**13. Plaintiff ,in an effort to be a good citizen, requested an appointment to speak to the Defendants to resolve the matter, said meeting took place the end of September,2016 (EXHIBIT 1).**

**14. Plaintiff alleged a fraudulent billing and corruption in the process and stated that without proof he would not pay the \$2,310.00.**

**15. Defendant Albert went so far as to infer that Plaintiffs house was on the line if Plaintiff did not satisfy their demand. Extortion! For which there is no immunity.**

**16. Plaintiff knew the Defendants were infuriated by his allegations, his taxes were under \$1,000.00 without the \$2,310.00 fraudulent charge.**

**17. Plaintiff applied for a tax hardship hearing as he is well into his retirement years, his case somehow got lost in the system and nothing became of it.**

**18. Unknown to Plaintiff at the time Defendants hatched a plot to have his house of twenty-five(25)years condemned and demolished as an act of revenge.(EXHIBIT 1).**

**19. In 2023 Plaintiff received the condemnation/demolition memo(EXHIBIT 1) that informed him of what went on behind his back.**

**20. Plaintiff was forcibly ejected from his house of twenty-five years in late February,2022 when it was demolished not because of any structural deficiency but out of Defendants revenge, alleging the unpaid “Weed Cutting” charge as the basis for the demolition, for which there is no connection between weeds outside and the structure of the house.**

**21. Defendants failed to observe the rules governing “Due Process”. Defendants controlled the demolition process from beginning to end. No “Due Process” no Court hearings, no opportunity for Plaintiff to state his case for the record, not even accurate files**

**22.Defendants went so far as to pass a resolution prohibiting anyone suing them from obtaining FOIA information, obviously Plaintiff.**

**23. Further, in 2019 Defendants passed Ordinance 20.04e prohibiting Plaintiff from reoccupying his house if he ever left.**

**24. Defendants basically wanted Plaintiff out because his was the last house making it a nonconforming structure in their new industrial zone.**

**COUNT I**  
**42 U.S.C. SECTION 1983 RETALIATION IN VIOLATION**  
**OF THE FIRST AMENDMENT OF THE U.S. CONSTITUTION**

**25. Plaintiff hereby incorporates by reference paragraphs one(1) through twenty-four(24) of this Complaint as if fully stated herein.**

**26. When alleging a First Amendment retaliation claim, Plaintiff must show;**

- a. Plaintiffs' speech was protected, Plaintiff tried to do the right thing, meeting with Defendants to remedy the situation;**
- b. That Defendants alleged retaliatory action adversely affected the Plaintiffs' Constitutionally protected speech by responding with character assassinations and extortion threats;**
- c. A causal relationship exists between Plaintiffs' speech and the Defendants retaliatory action. "See *Dickerson v Duncan*, Civil action no.: 7:19 CV00802 2020.**

**27. The retaliatory acts violated The Constitutional rights guaranteed to Plaintiff by The First Amendment of The United States Constitution .Defendants actions were not**

taken in good faith.

28. Defendants lacked probable cause when they took retaliatory actions against Plaintiff, no immunity of any kind for retaliation.

29. As the direct and proximate result of Defendants' unreasonable and unlawful actions, Plaintiff suffered and continues to suffer substantial past and future damages, both compensatory and general, including, but not limited to, the loss of his home of twenty-five years(25) and everything in it total value over Two hundred thousand dollars (\$200,000.00) homelessness, severe emotional distress, mental anguish, embarrassment and humiliation.

30. Because Defendants were "Motivated by evil motive or intent" and/or involved a reckless or callous indifference to the Federally protected rights of Plaintiff an award of punitive damages is appropriate to the fullest extent permitted by law. *See Morning V Dillon Cty.*, No.:4:15-cv-03349-RBH -TER, 2018, quoting *Smith V Wade*.

**COUNT II**  
**42 U.S.C. SECTION 1983-VIOLATION OF THE 4<sup>th</sup> AMENDMENT**  
**OF THE U.S. CONSTITUTION**

31. Plaintiff hereby incorporates by reference paragraphs one(1) through



**thirty(30) of this Complaint as if fully stated herein.**

**32. Defendants actions in the unlawful and without “Due Process” seizure and demolition of Plaintiffs’ home violated The Constitutional rights guaranteed Plaintiff by the Fourth Amendment of The United Stated Constitution.**

**33. Defendants actions were not taken in good faith and were clearly in violation of established law.**

**34. Defendants actions were unnecessary, unreasonable, unlawful and unjustified.**

**35. As the direct and proximate result of the Defendants unreasonable and unlawful actions, Plaintiff has suffered and will continue to suffer well into the future damages both compensatory and general, including, but not limited to, loss of his home and contents of twenty-five years and more, for which there is no immunity of any kind.**

**36. Because Defendants actions ware “Motivated by evil motive or intent” and involved a reckless or callous indifference to the Federally protected rights of Plaintiff an award of punitive damages is appropriate to the fullest extent permitted by law. *See Morning v Dillon Cty.***

**COUNT III**  
**42 U.S.C. SECTION 1983-FAILURE TO INTERVENE IN VIOLATION OF**  
**THE 4<sup>TH</sup> AMENDMENT OF THE UNITED STATES CONSTITUTION**

37. Plaintiff hereby incorporates by reference paragraphs one(1) through thirty-six(36) as if fully stated herein.

38. One or all of the Defendants should have known better “The concept of bystander liability is premised on the duty to uphold the law and protect the public from illegal acts regardless of who commits them” *See Randall v Prince George Cty. Md.*, 302 F.3d 188, 203(4<sup>th</sup> Cir.2002) A Defendant may be liable under Section 1983 on the theory of bystander liability, if they:

- a. Know Constitutional rights are being violated,
- b. Have reasonable opportunity to prevent harm,
- c. And chooses not to, for which there is no immunity of any kind.

39. As the direct and proximate cause of Defendants unreasonable and unlawful actions, Plaintiff has suffered the loss of his home and is now homeless, all of which could have easily been avoided.

40. Because Defendants actions were “Motivated by evil motives or intent and/or

involved reckless or callous indifference to the Federally protected rights of Plaintiff an  
award of punitive damages is appropriate to the fullest extent permitted by law. *Supra*.

**COUNT IV**  
**VIOLATIONS OF THE 5<sup>TH</sup> AMENDMENT OF THE UNITED STATES**  
**CONSTITUTION DEPTIVATION OF PROPERTY**

41. Plaintiff hereby incorporates by reference paragraphs one(1) through  
forty(40) of this Complaint as if fully stated herein.

42. Defendants controlled the condemnation/demolition process from beginning to  
end and thus denied Plaintiff his right to “Due Process” under the Fifth Amendment of The  
United States Constitution, no notice, no Court proceedings, no official records, just  
reckless and callous indifference to Plaintiffs’ Federally protected Fifth Amendment  
right “Not to be deprived of life, liberty or property without “Due Process”, for which  
there is no immunity for Defendants. *See Richmond Elks Hall Association -v- Richmond*  
*redevelopment agency* 561 F 2d 1327

43. Defendants lacked probable cause when they took retaliatory action against  
Plaintiff.

**COUNT V**  
**VIOLATIONS OF THE 14<sup>th</sup> AMENDMENT OF THE UNITED**  
**STATES CONSTITUTION LIFE LIBERTY AND PROPERTY RIGHTS**

44. Plaintiff hereby incorporates by reference paragraphs one(1) through forty-three of this Complaint as if fully stated herein.

45. Defendants seizure and demolition of Plaintiffs' home was a clear violation of property owners rights under The Fourteenth Amendment of The United States Constitution, for which there is no immunity of any kind.

46. Defendants actions were unnecessary, unreasonable, unlawful and unjustified and were "Motivated by evil motive or intent" and are the proximate cause of Plaintiffs' losses

47. Defendants actions were not done in good faith and were clearly in violation of established law and done with reckless and careless indifference, no immunity available.

**PRAYER**

**WHEREFORE, For all the above stated facts and even more, if this case were to go to trial, Plaintiff humbly prays that this Honorable Court would grant the following relief:**

- A) Compensatory damages for all past and future economic losses and expenses incurred by Plaintiff as a result of Defendant's misconduct;**
- B) Punitive damages to the fullest extent permitted by law;**
- C) Declare that Defendants acts individual/official as alleged above violated The First, Fourth, Fifth and Fourteenth Amendments of The United States Constitution;**
- D) Award any other such relief that This Honorable Court deems fair and just at the time of final judgement.**

**Dated: February 13,2024**

**Respectfully submitted,  
/s/ Francis Romeo  
Plaintiff-Pro Se**

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**Plaintiff requests a trial by jury.**

**Dated: February 13,2024**

**Respectfully submitted,  
/s/ Francis Romeo  
Plaintiff Pro Se**

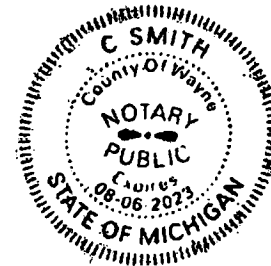
**11398 HARKISON  
Romeo, MI 48174  
1751 Highview  
Dearborn, MI 48128**

**734 299-0261  
Clementine0261@gmail.com**

**AFFIDAVIT**

I Francis Romeo, being first duly sworn, declare and affirm that this document has been examined by me and that it's contents are true and if called upon to testify to their accuracy and validity I would.

Signed Francis Romeo  
Francis Romeo



*C. Smith*  
7/13/2023  
exp 8/16/2023  
Wayne CO MI

**EXHIBIT 1**

**THIS IS THE MEMO STARTED BY ASSESSOR JULIE ALBERT TO CHIEF OF STAFF WOJTYLKO THAT STARTED THE WHOLE CONTROVERSY.**

Assessor Julie Albert Memo's Chief of Staff Julie Wojtylko telling her to have Ginny Godell condemn and demolish Plaintiffs' home because he has a question about an over inflated charge for weed cutting, that defendant city has no proof of performance for and Plaintiff alleges it was never done.

**Wojtylko, Julie**

From: Albert, Julie  
Sent: Thursday, September 29, 2016 3:32 PM  
To: Wojtylko, Julie  
Subject: RE: 11398 Harrison

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From: Wojtylko, Julie  
Sent: Thursday, September 29, 2016 2:56 PM  
To: Albert, Julie <jalbert@romulusgov.com>; Akins, Abbie <aakins@romulusgov.com>; Godell, Ginny <ggodell@romulusgov.com>  
Cc: Freeman, Bonnie <bfreeman@romulusgov.com>; Mayor <Mayor@romulusgov.com>  
Subject: 11398 Harrison

Mayor Burcroff met yesterday with Mr. Frank Romeo. Chief Settles, Director Freeman and I were also in attendance. Mr. Romeo requested the meeting due to charges placed on his taxes for onsite clean up done by our City Contractor following failure to respond to the warning notice from the Ordinance Department.

For Assessing it is best to use the site address if we have no other address info (that's what we have on file for 11398 Harrison)

Ginny - If Bonnie has not already requested this, please have an inspector check the property it may be time to put it on a demolition list? Would like to know the condition of the structure - he has asked about fencing in the property which would require variances and before we get involved in that process (it is a non-conforming use), I would like to know if we should be taking steps to have it condemned.

Please follow up and advise -

Thank you -

*Julie A. Wojtylko*  
Julie A. Wojtylko, Chief of Staff  
City of Romulus  
Office of the Mayor  
11111 Wayne Road  
Romulus, MI 48174  
(734) 955-4501  
[www.romulusgov.com](http://www.romulusgov.com)  
[jwojtylko@ci.romulus.mi.us](mailto:jwojtylko@ci.romulus.mi.us)

**PAGE 5**

City of Romulus Value Statement  
*The City of Romulus is passionate about customer service at all levels.  
We have initiated a solutions oriented culture.  
Our team of dedicated employees work together to deliver outstanding professional services.*



**EXHIBIT 2**

## CITY OF ROMULUS

## TAX CERTIFICATION

School: 82130

TAX SUMMARY FOR CALENDAR YEAR 2016

Property #: 80 094 99 0008 000

TREASURER'S OFFICE

11111 WAYNE RD

ROMULUS MI 48174

(734) 942-7580

SITE ADDRESS:

11398 HARRISON

SEV 28,800

AV 28,800

TAXV 28,634

ROMEO TINA - FRANK

11398 HARRISON

ROMULUS MI 48174

Mortgage Company of Record:

NONE

Prop Type :

PRE/MBT %: 100

## Summer Tax Bill

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MILLS	TAX TYPE	TAX AMOUNT
9.40630	CITY OPERATING	269.33
1.55000	SANITATION	44.38
0.50000	LIBRARY	14.31
0.06080	PA359 PROMOTIONS	1.74
5.64830	COUNTY CHARTER	161.73
6.00000	STATE EDUC TAX	171.80
18.00000	ROM SCH OP (NH)	0.00
1.31370	ROM SCH OP (HH)	37.61
8.25000	ROM SCH DEBT	236.23
0.75000	ROM SCH SINK FND	21.47
18.00000	SCHOOL OPER FC	0.00
0.00000	DELINQ WEED CUT	2,310.00

## Winter Tax Bill

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MILLS	TAX TYPE	TAX AMOUNT
0.95290	COUNTY OPERATING	27.28
0.24590	COUNTY PARKS	7.04
0.93810	COUNTY JAIL	26.86
0.03680	COUNTY VETERANS	1.05
1.00000	WCTA (SMART)	28.63
0.10000	WAYNE CO ZOO	2.86
0.20000	DIA AUTHORITY	5.72
2.38680	EPA LEVY	68.34
0.21460	HCMA (PARKS)	6.14
3.24080	WC COMM COLLEGE	92.79
0.09650	RESA OPERATIONS	2.76
3.36780	SPEC EDUC -VOTED	96.43
2.00000	RESA ENHANCEMENT	57.26
0.00000	SEXTON KILFOIL	4.08

TOTAL TAXES	3,268.60
ADMIN FEE	32.68
INTEREST	147.09
TOTAL BILL	3,448.37

TOTAL TAXES	427.24
ADMIN FEE	4.27
INTEREST	17.09
TOTAL BILL	448.60

Date Prepared: 01/09/2020

## **EXHIBIT 3**

A

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**ORIGINAL**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**CRIMINAL NO. 18-20255**

**vs.**

**HON. VICTORIA A. ROBERTS**

**OFFENSE: 18 U.S.C. § 666(a)(2)**

**D-2 WILLIAM PRITULA,**

**Defendant.**

**MAXIMUM PENALTIES:**  
Up to ten years' imprisonment.  
Up to \$250,000 fine.  
Supervised Release: Up to three years.

**RULE 11 PLEA AGREEMENT**

Pursuant to Rule 11 of the Federal Rules of Criminal Procedure, defendant  
**WILLIAM PRITULA** and the government agree as follows:

**1. Guilty Plea**

**A. Count of Conviction**

The defendant will enter a plea of guilty to Count One of the Superseding Information, which charges him with federal program bribery, in violation of 18 U.S.C. § 666(a)(2).

**B. Elements of Offense**

The elements of federal program bribery that the government would need to prove beyond a reasonable doubt at trial are:


A

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18. **Acceptance of Agreement by Defendant.**

This plea offer expires unless it has been received, fully signed, in the Office of the United States Attorney by 5:00 P.M. on June 12, 2018. The government reserves the right to modify or revoke this offer at any time before defendant pleads guilty.

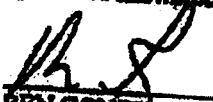
**MATTHEW SCHNEIDER**  
United States Attorney

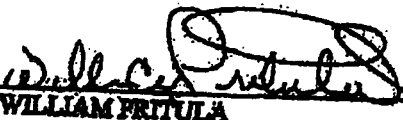
  
**DAVID A. LASHLEY**  
Assistant United States Attorney  
Chief, Public Corruption Unit

  
**EATON F. BROWN**  
Assistant United States Attorney

Dated: **6-5-18**

By signing below, defendant acknowledges that he has read (or been read) this entire document, understands it, and agrees to its terms. He also acknowledges that he is satisfied with his attorney's advice and representation. Defendant agrees that he has had a full and complete opportunity to confer with his lawyer, and has had all of his questions answered by his lawyer.

  
**BEN GONER**  
**ROBERT MORGAN**  
Attorneys for Defendant

  
**WILLIAM FRITULA**  
Defendant

**7/16/18**  
Dated

**July 16 - 2018**  
Dated

Work,” Warner wrote the words “grass cutting and snow plowing.” The  
WCAA provided a copy of this document to the agents. On August 16,  
2017, Warner’s lawyer provided the agents with a copy of the same  
document, with the word “consulting” added to the section describing the  
nature of work.

### Summary of the Counts

Counts one through four of the fifth superseding indictment  
encompass the bribery, theft and money laundering conspiracies Warner  
engaged in with Pritula. Counts five and six relate to a similar conspiracy  
Warner engaged in with Earles. Counts seven, eight, and nine relate to  
Warner’s scheme to defraud both the WCAA and West Bloomfield  
Township with Tenaglia. Count ten relates to Warner’s attempt to  
obstruct justice by altering his report of outside employment form. As  
stipulated and agreed to by the parties, the government intends to  
present evidence of each of the three conspiracies in installments. Below  
is a summary of potential evidentiary issues that may arise during trial.

**MANNER AND MEANS**

The defendant carried out the conspiracy through the following manner and means:

10. JAMES WARNER and William Pritula devised and engaged in a scheme in which JAMES WARNER would provide confidential and proprietary information to William Pritula in order to enable William Pritula to secure facilities and maintenance contracts at DTW.
11. After William Pritula secured the contracts, JAMES WARNER, with William Pritula's knowledge and permission, would create fraudulent invoices on behalf of William Pritula's company for work contracted to be performed at DTW.
12. The fraudulent invoices grossly inflated the cost and scope of William Pritula's labor and materials, so that William Pritula and JAMES WARNER could defraud the WCAA and pay kickbacks to JAMES WARNER.
13. JAMES WARNER, with William Pritula's knowledge and permission, created an email account in William Pritula's name from which JAMES

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received in excess of \$10,000.00 under one or more federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of federal assistance in each one-year period for the years 2010 through 2014.

Defendant WILLIAM PRITULA owned and operated Pritula and Sons, a company which sought and entered into contracts for pavement repair and replacement, as well as water main repair and fire hydrant installation and maintenance at Detroit Metropolitan Airport (DTW), a division of the WCAA. From September of 2010 through October of 2014, James Warner, an agent of the WCAA, devised and PRITULA participated in a scheme in which Warner would provide inside information to PRITULA in order to enable PRITULA to secure facilities and maintenance contracts at DTW. After PRITULA secured the contracts for PRITULA's company, Warner, with PRITULA's knowledge and permission, would then create and submit fraudulent invoices on PRITULA's behalf for work PRITULA performed at DTW. The fraudulent invoices grossly inflated the cost of PRITULA's labor and materials. Following the WCAA's payment to PRITULA, Warner and PRITULA would divide the inflated proceeds equally. From September of 2010 through October of 2014, PRITULA's company received over \$18,000,000.00 in payments from the WCAA. Of that amount, PRITULA, acting corruptly and with the intent to influence and reward Warner, paid Warner kickbacks amounting to over \$5,000,000.00.



**WCAA Payments to Pritula**

<u>Date Deposited</u>	<u>Amount</u>	<u>Date Deposited</u>	<u>Amount</u>	<u>Date Deposited</u>	<u>Amount</u>
09/10/2010	\$110,000.00	09/13/2011	\$135,710.00	04/05/2013	\$6,600.00
09/21/2010	\$36,000.00	09/13/2011	\$346,550.00	04/25/2013	\$3,030.00
09/21/2010	\$57,580.00	09/22/2011	\$30,000.00	05/03/2013	\$350,000.00
09/22/2010	\$238,680.00	09/22/2011	\$4,384.00	05/21/2013	\$23,108.00
09/22/2010	\$40,500.00	10/11/2011	\$142,050.00	06/10/2013	\$125,000.00
10/01/2010	\$128,100.00	10/24/2011	\$664,150.00	06/20/2013	\$48,962.00
10/01/2010	\$77,050.00	10/31/2011	\$204,361.80	06/20/2013	\$11,064.00
10/08/2010	\$41,286.00	10/31/2011	\$48,000.00	06/20/2013	\$636,703.60
10/21/2010	\$15,441.00	11/16/2011	\$137,013.20	06/27/2013	\$6,000.00
10/21/2010	\$83,500.00	01/04/2012	\$12,540.00	07/09/2013	\$158,550.00
10/29/2010	\$346,215.00	01/04/2012	\$30,828.00	07/09/2013	\$413,950.00
11/29/2010	\$309,406.50	01/04/2012	\$19,928.00	08/01/2013	\$152,000.00
12/03/2010	\$144,000.00	01/04/2012	\$70,000.00	08/07/2013	\$831,350.00
12/17/2010	\$60,000.00	01/04/2012	\$9,362.00	08/08/2013	\$163,550.00
12/17/2010	\$40,210.00	01/31/2012	\$4,726.00	08/20/2013	\$93,100.00
01/03/2011	\$16,480.00	02/23/2012	\$72,000.00	09/06/2013	\$393,100.00
01/03/2011	\$82,204.00	03/14/2012	\$100,058.00	09/06/2013	\$430,490.00
01/14/2011	\$13,060.00	04/16/2012	\$17,496.00	09/26/2013	\$27,000.00
01/25/2011	\$12,365.00	04/27/2012	\$97,860.00	09/26/2013	\$1,201,000.00
01/26/2011	\$12,034.00	05/01/2012	\$515,750.00	10/10/2013	\$432,300.00
02/11/2011	\$13,535.00	06/06/2012	\$100,000.00	10/18/2013	\$254,382.00
02/23/2011	\$235,848.00	06/25/2012	\$29,390.00	10/25/2013	\$213,406.00
03/18/2011	\$69,086.00	06/25/2012	\$7,360.00	11/20/2013	\$880,000.00
04/01/2011	\$1,899.00	07/06/2012	\$14,580.00	11/27/2013	\$5,000.00
04/01/2011	\$20,000.00	07/26/2012	\$22,726.00	11/27/2013	\$8,070.00
04/21/2011	\$11,340.00	08/03/2012	\$145,000.00	01/03/2014	\$50,000.00
04/21/2011	\$3,288.00	08/19/2012	\$134,741.24	01/28/2014	\$19,440.00
04/21/2011	\$5,850.00	08/29/2012	\$261,928.00	02/13/2014	\$23,832.00
04/29/2011	\$70,000.00	09/06/2012	\$293,260.00	02/20/2014	\$74,400.00
05/23/2011	\$24,168.00	09/21/2012	\$262,811.25	02/27/2014	\$20,696.00
05/23/2011	\$30,000.00	10/09/2012	\$269,357.40	03/14/2014	\$10,824.00
06/15/2011	\$300,092.00	10/17/2012	\$966,009.60	04/01/2014	\$314,520.00
06/15/2011	\$294,875.00	10/26/2012	\$5,182.00	05/16/2014	\$107,860.00
06/24/2011	\$16,486.00	11/09/2012	\$27,610.00	05/20/2014	\$134,038.00
06/24/2011	\$10,712.00	12/17/2012	\$13,420.00	06/26/2014	\$404,462.00
06/24/2011	\$38,712.00	12/17/2012	\$12,880.00	07/03/2014	\$255,450.00
07/06/2011	\$20,275.00	12/17/2012	\$2,000.00	07/14/2014	\$184,100.00
07/21/2011	\$289,761.25	01/11/2013	\$20,736.00	07/18/2014	\$693,049.95
07/26/2011	\$61,328.00	02/01/2013	\$13,954.00	07/30/2014	\$64,750.00
08/16/2011	\$15,000.00	02/01/2013	\$7,296.00	07/30/2014	\$61,110.00
08/24/2011	\$176,520.00	03/29/2013	\$29,512.00	09/10/2014	\$847,870.00
					<u>\$19,009,484.79</u>

**GOVERNMENT  
EXHIBIT  
767-26**

JS 44 (Rev. 04/21)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Francis Romeo

(b) County of Residence of First Listed Plaintiff Wayne  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Pro Se

**DEFENDANTS**

Julie Albert

County of Residence of First Listed Defendant Wayne  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
OF LAND INVOLVED.

Case:2:24-cv-10378

Judge: Grey, Jonathan J.C.

MJ: Patti, Anthony P.

Filed: 02-14-2024 At 03:04 PM

CMP ROMEO V ALBERT, ET AL (LG)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CIT**

- Citizen of This State ☐ 1 ☐ 1 Incorporated or Principal Place of Business In This State
- Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input checked="" type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C. Section 1983, First, Fourth, Fifth and Fourteenth Amendments of The U.S. Constitution.

Brief description of cause:

Fraud/Intentional misconduct/Torts

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

**DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

February 13, 2024

SIGNATURE OF ATTORNEY OF RECORD

/s/Francis Romeo Pro Se

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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